

Evan D. Schwab (NV Bar No. 10984)  
Email: evan@schwablawnv.com  
**SCHWAB LAW FIRM, PLLC**  
7455 Arroyo Crossing Parkway, Suite 220  
Las Vegas, NV 89113  
Telephone: 702-761-6438  
Fax: 702-921-6443

*Attorneys for Plaintiff Justin Ligeri*

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEVADA**

JUSTIN LIGERI, an individual,

Plaintiff,

v.

JOHN BURNS, JR., and individual;  
JOSHUA TISCHER, an individual;  
DOES I through X and ROE  
CORPORATIONS I through X, inclusive,

Defendant.

Case No. 2:22-CV-00284-GMN-VCF  
[Clark County District Court Case No. A-  
22-846203-C]

**Stipulation to Continue Briefing  
Deadlines**

Plaintiff Justin Ligeri, by and through his attorneys of record Evan D. Schwab, Esq. of Schwab Firm PLLC ("SLF") and Defendants John Burns, Jr. and Joshua Tischer, by and through their attorneys of record Kenneth Januszewski of Burch & Cracchiolo, P.A. and Christopher Anthony of Boyak Orme Anthony & Mckieve hereby file this Stipulation to Continue Briefing Deadlines as follows.

This Stipulation is entered into for the following reasons:

1. Defendants filed a Motion to Dismiss for Lack of Personal Jurisdiction ("Motion to Dismiss") on February 17, 2022. Plaintiff's Response to the Motion to Dismiss is presently due on or before March 3, 2022.
2. The Motion to Dismiss was filed around a Court holiday and the office of Counsel has had absences due to illness amongst employees. Additionally, the schedule and obligations of Counsel in this matter warrant a brief extension for the filing of the Response in this matter. Counsel propose that the Response be due on or

1 before March 10, 2022. Plaintiff's Counsel will extend any similarly requested  
2 professional courtesy with regard to any Reply in Support of Motion.

3 3. No trial date has been set in this matter and the instant extension would not cause  
4 undue delay, prejudice or otherwise to any of the Parties to this action. No formal  
5 hearing has been set on the Motion to Dismiss.

6 4. This stipulation is entered into in good faith.

7 Dated this 3<sup>rd</sup> day of March 2022

8 Schwab Law Firm PLLC

9 /s/ Evan Schwab

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Evan D. Schwab (NV Bar No. 10984)  
11 7455 Arroyo Crossing Parkway, Suite 220  
Las Vegas, Nevada 89113  
12 E: evan@schwablawnv.com  
T: 702-761-6438  
13 F: 702-921-6443

14 Attorneys for Plaintiff

15 Dated this 3<sup>rd</sup> day of March 2022

16 Burch & Cracchiolo, P.A.

17 /s/ Kenneth Januszewski

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Kenneth Januszewski (NV 9482)  
1850 N. Central Avenue, Suite 1700  
19 Phoenix, AZ 85004  
E: kenj@bcattorneys.com  
20 T: 602-234-8799  
F: 602-234-0341

21 Attorneys for Defendants

Dated this 3<sup>rd</sup> day of March 2022

Boyack Orme Anthony & McKieve

/s/ Christopher Anthony

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Christopher Anthony (NV 9748)  
7432 W. Sahara Avenue, #101  
23 Las Vegas, Nevada 89117  
E: canthony@boyacklaw.com  
24 T: 702-562-3415  
25 F: 702-562-3570

26 Attorneys for Defendants

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**Stipulation to Continue Briefing  
Deadlines**

**Findings of Fact**

Based upon the Stipulation to Continue Briefing Deadlines filed by Counsel for the Parties, and good cause appearing, the Court finds that:

1. Defendants filed a Motion to Dismiss for Lack of Personal Jurisdiction (“Motion to Dismiss”) on February 17, 2022. Plaintiff’s Response to the Motion to Dismiss is presently due on or before March 3, 2022.
2. The Motion to Dismiss was filed around a Court holiday and the office of Counsel has had absences due to illness amongst employees. Additionally, the schedule and obligations of Counsel in this matter warrant a brief extension for the filing of the Response in this matter. Counsel propose that the Response be due on or before March 10, 2022. Plaintiff’s Counsel will extend any similarly requested professional courtesy with regard to any Reply in Support of Motion.
3. No trial date has been set in this matter and the instant extension would not cause undue delay, prejudice or otherwise to any of the Parties to this action. No formal hearing has been set on the Motion to Dismiss.
4. This stipulation is entered into in good faith.

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**Conclusions of Law**

Federal Rule of Civil Procedure 6(b) et seq. permits the Court to extend the time for briefing under including, but not limited to, the following circumstances: “with or without motion or notice if the court acts, or if request is made, before the original time or its extension expires...” In the instant matter Counsel have submitted a Stipulation to continue the briefing deadlines and good cause appears.

**Order**

**IT IS SO ORDERED** that Plaintiff’s Response to Defendant’s Motion to Dismiss for Lack of Personal Jurisdiction will be due on or before March 10, 2022.

Dated this 3 day of March, 2022

  
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Gloria M. Navarro, District Judge  
UNITED STATES DISTRICT COURT